# RICHARDSON GARDNER & ALEXANDER

ATTORNEYS-AT-LAW

117 E. WASHINGTON STREET
GLASGOW, KENTUCKY 42141-2696
writer's e-mail: wlg@rgba-law.com

BOBBY H. RICHARDSON WOODFORD L. GARDNER, JR. T. RICHARD ALEXANDER II (270) 651-8884 (270) 651-2116 FAX (270) 651-3662

January 8, 2015

RECEIVED
JAN 0 9 2015

PUBLIC SERVICE COMMISSION

Mr. Jeff Derouen Kentucky Public Service Commission 211 Sower Boulevard P.O. Box 615 Frankfort, Kentucky 40602

Re: Case No. 2014-00430

Dear Mr. Derouen:

Please see attached for filing with the Commission Farmers Rural Electric Cooperative Corporation's ("Farmers") application for rehearing of the requirements in ordering paragraphs 2 through 6 of the Commission's December 22, 2014 Order in the stated case.

Very truly

Please contact me if you have any questions.

Woodford L. Gardner, Jr.

Attorney for Farmers Rural Electric

RECEIVED

# JAN **09** 2015

PUBLIC SERVICE COMMISSION

# COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

#### IN THE MATTER OF:

TARIFF FILING OF FARMERS RURAL ELECTRIC COOPERATIVE	)	
CORPORATION FOR APPROVAL OF A NEW DEMAND-SIDE	)	CASE NO.
MANAGEMENT PROGRAM FOR ENERGY STAR APPLIANCES	)	2014-00430
AND FOR APPLICANCE RECYCLING	1	

### APPLICATION FOR REHEARING

Farmers Rural Electric Cooperative Corporation ("Farmers"), pursuant to KRS 278.400 and 807 KAR 5:001, Section 9, respectfully submits this application to the Kentucky Public Service Commission ("Commission") for rehearing of its Order of December 22, 2014 entered in this proceeding. Specifically, Farmers seeks modification of the requirements contained in ordering Paragraphs Nos. 2 through 6.

#### Paragraph No. 2

In its December 22, 2014 Order the Commission directed that Farmers should file with the Commission a copy of the fully executed contract with the third-party implementation contractor for the Appliance Recycling Program ("ARP") and the Energy Star Appliances Program ("ESAP") within 20 days of its execution. In its November 13, 2014 letters submitting the ARP and ESAP tariffs for approval, Farmers indicated that East Kentucky Power Cooperative, Inc. ("EKPC") had issued requests for proposals for the third-party implementation contractor and that EKPC was prepared to contract with the successful company. Farmers did not indicate that there would be a separate contract between itself and the third-party implementation contractor.

Farmers wishes to clarify that it will not be executing a separate contract with the third-party implementation contractor. The only contract will be between EKPC and the contractor, and EKPC submitted the fully executed contract with the Commission on December 19, 2014. Attached to this application for rehearing as Exhibit A is an affidavit from Patrick C. Woods, Director of Regulatory and Compliance Services for EKPC attesting to this fact.

Farmers therefore requests rehearing and asks that the Commission examine ordering Paragraph No. 2 in light of the clarification offered in this application and relieve Farmers of the requirement to file the contract.

## Paragraph Nos. 3 through 6

In its December 22, 2014 Order the Commission required Farmers to file six-month and 12-month evaluation reports of the ARP and ESAP. Ordering Paragraph Nos. 3 through 6 specify certain information that is to be included in each evaluation report. Farmers notes that in the Commission's approval of EKPC's ARP and ESAP the same information is requested and

that information is to be provided for each owner-member of EKPC. In the attached affidavit of Mr. Woods, EKPC has committed to prepare the requested evaluation reports and the information will be presented for each owner-member of EKPC separately.

Farmers respectfully submits that it is unnecessary to require Farmers to submit evaluation reports on these two programs that will be identical to the evaluation reports that EKPC will be submitting to the Commission. Farmers therefore requests rehearing and asks that the Commission examine ordering Paragraph Nos. 3 through 6 in light of the commitment of EKPC to provide the requested evaluation reports and relieve Farmers of the requirement to file the six-month and 12-month evaluation reports for the ARP and ESAP.

WHEREFORE, Farmers respectfully applies to the Commission to grant its request for rehearing, consider the matters raised herein, and clarify the Commission's December 22, 2014 Order where appropriate.

Dated at Glasgow, Kentucky this 8th day of January, 2015.

Woodford L. Gardner, Jr.
Richardson, Gardner & Alexander
Attorney for Farmers RECC
117 East Washington Street
Glasgow, Kentucky 42141
Phone: (270) 651-8884

Fax: (270) 651-3662

E-Mail: wlg@rgba-law.com

Woodford L. Gardner, Jr., Attorney